

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NUMBER: 04-12097GAO

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

and

JOHN BALDWIN, LEONARD BELL,
JOHANNES KAINDOH, WAYNE HENDERSON,
GODWIN ENAGBARE and JOE L. WILLIS,
Intervenor Plaintiffs,

v.

WASHINGTON GROUP INTERNATIONAL, INC.,
RON BENNETT, MICHAEL FOGARTY, and
DENNIS WOODRUFF,
Defendants.

DEFENDANT'S MOTION FOR A PROTECTIVE ORDER

Defendant, Washington Group International ("WGI") hereby moves pursuant to Fed. R. Civ. P. 26(c) for a protective order precluding Plaintiff from deposing WGI's Chief Executive Officer, Stephen G. Hanks.

In support of its position and Motion for a Protective Order, WGI submits the accompanying Memorandum of Law, along with the Affidavits of Mr. Hanks and Stephen T. Paterniti, each of which is filed herewith.

Accordingly, WGI requests that Defendant's Motion for Protective Order be allowed.

Respectfully submitted,
WASHINGTON GROUP INTERNATIONAL, INC.,
By its attorneys,

\s\Stephen T. Paterniti

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Dated: December 29, 2006

CERTIFICATE OF SERVICE

This is to certify that this document was filed through the ECF System and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies to those indicated as non-registered participants.

\s\Stephen T. Paterniti
Jackson Lewis LLP